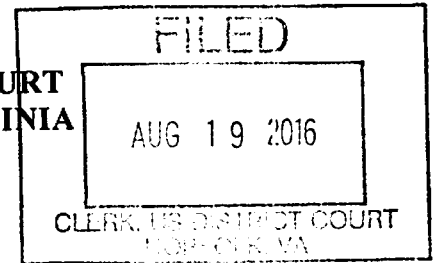


**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Norfolk Division**



R.M.S. TITANIC, INC.,
successor in interest to Titanic
Ventures, limited partnership,

Plaintiff,

v.

The Wrecked and Abandoned
Vessel, . . . believed to be
the RMS TITANIC, in rem,

Defendant.

CIVIL ACTION NO: 2:93-CV-902

PLAINTIFF'S MOTION TO FILE UNDER SEAL

NOW COMES Plaintiff R.M.S. Titanic, Inc. ("Plaintiff") by and through counsel, and moves this Court for entry of an order sealing from public disclosure the unredacted version of Exhibit 1 to the Periodic Report of R.M.S. Titanic, Inc. on the Progress of Research and Recovery Operations.

In support of its Motion to Seal, Plaintiff refers this Court to its Memorandum in Support, filed simultaneously herewith.

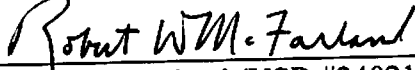
WHEREFORE, Plaintiff prays that the Court grant its motion for an order sealing the unredacted version of the above referenced document from public disclosure, and enter the attached Proposed Order for the reasons set forth in the accompanying Memorandum in Support.

Respectfully submitted,

R.M.S. TITANIC, INC.

By Counsel

Counsel:

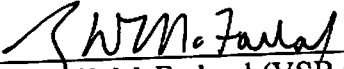


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CERTIFICATION

I hereby certify that a copy of the foregoing has been delivered this day to Kent Porter, Esq., U.S. Attorney's Office, 8000 World Trade Center, Norfolk, VA 23510, this 19 day of August, 2016.


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